

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

**IN RE:  
ANDREA RENAE COTEY**

**CASE NO: 13-41833  
CHAPTER: 7  
JUDGE: RHODES**

**Debtors** /

**MOTION FOR REDEMPTION UNDER 11 U.S.C. 722**

**NOW COME(S)** the Debtor(s), **ANDREA RENAE COTEY**, by and through his/her/their counsel, **WILLIAM R. ORLOW**, and moves the Court pursuant to 11 U.S.C. 722 and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

1. The item to be redeemed is tangible personal property held primarily for family or household use and is more particularly described as follows:

**A. Computer**

2. The interest of the Debtor(s) in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditor, **Capital One/Best Buy**) is a dischargeable consumer debt.
3. The allowed secured claim of **Capital One/Best Buy**, for purposes of redemption, the “redemption value”, should be determined to be not more than **\$50.00**.
4. Arrangements have been made by the Debtor(s) to pay **Capital One/Best Buy**, up to the aforesaid amount in a lump sum should this motion be granted.

**WHEREFORE**, the Debtor(s) request(s) the Court to order the said Creditor to accept from the Debtor(s) the lump sum payment of the redemption value and release their lien of record. In the event the said Creditor objects to this motion, the Debtor(s) request the Court to determine the value of the property as of the time of the hearing on such objection.

**Dated: February 27, 2013**

**/S/ William R. Orlow**  
**William R. Orlow (P41634)**  
**24100 Woodward Avenue, Suite B**  
**Pleasant Ridge, Michigan 48069**  
**Phone: (248) 584-2100**  
**Email: boccef@boclaw.com**

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

**IN RE:  
ANDREA RENAE COTEY**

**CASE NO: 13-41833  
CHAPTER: 7  
JUDGE: RHODES**

**Debtors** //

**PROPOSED ORDER OF REDEMPTION**

Upon the motion of the Debtor(s) and there having been no responsive filing or objection within the time required, the Court finds as follows:

1. The item to be redeemed is tangible personal property held primarily for family or household use and is more particularly described as follows:

**A. Computer**

2. The debt owing the Creditor, **Capital One/Best Buy** is a dischargeable consumer debt and the Debtor(s) interest in such property is exempt or has been abandoned by the estate.
3. The value of the secured claim of **Capital One/Best Buy**, for redemption purposes, the “redemption amount” is **\$50.00**.

**IT IS HEREBY ORDERED** that the Debtor(s) may redeem the subject property by paying to **Capital One/Best Buy**, on or before the sixtieth (60<sup>th</sup>) day following entry of this Order the redemption amount. Upon timely receipt of such payments, the Creditor is ordered to cancel its lien of record and surrender the certificate of title in accord with the Debtor instruction. In the event of the failure of the Debtor(s) to pay the redemption amount within such time frame, the automatic stay shall immediately terminate.

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

**IN RE:**

**ANDREA RENAE COTEY**

**CASE NO: 13-41833**

**CHAPTER: 7**

**JUDGE: RHODES**

Debtors /

Address 22006 Boulder Ave., Eastpointe, MI 48021

Last four digits of Social Security or  
Employer's Tax Identification (EIN) No(s).(if any): xxx-xx-0252

**NOTICE OF MOTION FOR REDEMPTION UNDER 11 U.S.C. 722**

William R. Orlow has filed papers with the court for the Motion for Redemption Under 11 U.S.C. 722

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to [relief sought in a motion or objection], or if you want the court to consider your views on the [motion] [objection], within 21 days, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:<sup>1</sup>

**United States Bankruptcy Court**  
211 W. Fort Street, Suite 2100  
Detroit, Michigan 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also mail a copy to:

William R. Orlow  
Attorney for Debtor(s)  
24100 Woodward Avenue  
Pleasant Ridge, Michigan 48069

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

**If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.**

**Dated: February 27, 2013**

**/S/ William R. Orlow**  
**William R. Orlow (P41634)**  
**24100 Woodward Avenue**  
**Pleasant Ridge, Michigan 48069**  
**Phone: (248) 584-2100**  
**Email: bocecf@boclav.com**

<sup>1</sup> Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e)

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

**IN RE:  
ANDREA RENAE COTEY**

**CASE NO: 13-41833  
CHAPTER: 7  
JUDGE: RHODES**

**Debtors** \_\_\_\_\_/

**CERTIFICATE OF SERVICE**

**William R. Orlow** hereby certifies that on **February 27, 2013** a copy of the **Motion for Redemption, Proposed Order, Notice of Motion and Certificate of Service**, was filed with the Clerk of the Court using the ECF System, which will send notification of such filing to the following:

**K. Jin Lim  
Chapter 7 Trustee**

**And was sent via regular mail upon:**

**Capital One/Best Buy  
C/o Bass & Associates  
3936 E. Fort Lowell Rd.  
Ste. 200  
Tucson, AZ 85712**

**/S/ William R. Orlow  
William R. Orlow (P41634)  
24100 Woodward Avenue, Suite B  
Pleasant Ridge, Michigan 48069  
Phone: (248) 584-2100  
Email: bocecf@boclaw.com**

Drafted by:  
William R. Orlow  
24100 Woodward Avenue  
Pleasant Ridge, MI 48069  
(248) 584-2100